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By ECF

February 21, 2022

Hon. Katherine Polk Failla
United States Courthouse
Room 618
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Letter Request to Modify Conditions of Pretrial Release
U.S. v. Caraballo Pache, et al., 21-CR-675 (KPF)

Dear Judge Failla:

I write to request a modification of the conditions of pretrial release for my client, Candelario Martinez, in the above-captioned case. On February 7, Mr. Martinez saw a doctor due to severe pain he was experiencing in his right shoulder, and was told that he will need to get an MRI and likely surgery to resolve the issue. I have spoken with Jaime Stroup, the Pretrial Services Officer in the Eastern District of Pennsylvania supervising Mr. Martinez, who informed me that the ankle monitoring bracelet that Mr. Martinez currently wears will need to be removed during both procedures. Because Mr. Martinez has been fully compliant with all conditions this Court has imposed and has had no issues since his pretrial supervision began, Mr. Stroup has no objection to the permanent removal of ankle monitoring as a condition of Mr. Martinez's pretrial release in advance of the MRI. I have also spoken with Mr. Burnett, who informed me that the government similarly has no objection to this.

As such, we respectfully ask that the court modify the order setting the conditions of Mr. Martinez's pretrial release to remove the ankle monitoring requirement. If the Court wishes, I am happy to provide further documentation of or information about the medical issues underlying this request, either via email or as a separate, sealed filing.

Respectfully submitted,

/s/ Marisa Taney
Marisa Taney

Counsel to Candelario Martinez

cc: Counsel of Record (via ECF)

Application GRANTED. The conditions of Mr. Martinez's pretrial release shall be modified to permit the removal of his ankle monitor.

The Clerk of Court is directed to terminate the pending motion at docket entry 25.

Dated: February 22, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE